



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

AR:whc  
F. #2021R00608

*271 Cadman Plaza East  
Brooklyn, New York 11201*

December 5, 2024

By ECF

James Darrow, Esq.  
Federal Defenders of New York  
1 Pierrepont Plaza, 16th Floor  
Brooklyn, New York 11201

Re: United States v. Domagoj Patkovic  
Criminal Docket No. 24-CR-317 (RER)

Dear Counsel:

Enclosed please find discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This production supplements the government's initial production, which was disclosed on October 16, 2024, and November 4, 2024. The government also requests reciprocal discovery from the defendant. These materials are produced under the terms of the Stipulation and Protective Order signed by counsel and entered by the Court. The "Sensitive Discovery Materials" are identified by the prefix "SDM." The production consists of the following:

- Arrest Warrant, Consent to Search and related materials are enclosed herein and Bates-stamped DP000057 - DP000061.
- A return associated with a judicially authorized search warrant is enclosed herein and Bates-stamped DP000255.
- Images from social media accounts and related materials are enclosed herein and Bates-stamped DP000062, DP000197 – DP000225, DP000233, and DP000254.
- Records relating to the defendant's criminal history and records from the California Department of Motor Vehicles are enclosed herein and Bates-stamped DP000176 - DP000195, DP000204 – DP000213 and DP000234 - DP000243.

- Surveillance photos are enclosed herein and Bates-stamped DP000247 – DP000253.
- Additional photos of the defendant are enclosed herein and Bates-stamped DP000244 - DP000246.
- An audio recording of a phone call is enclosed herein and Bates-stamped DP000223.
- Bates numbers DP000220 - DP000221, DP000196 and DP000214 have been intentionally omitted.
- Records from the below entities are enclosed herein and Bates-stamped as indicated:

Entity	Bates Nos.
AcuityAds	DP000601-DP000602
Acxiom	DP000603-DP000610
AdColony	DP000611-DP000612
AppLovin	DP000613-DP000614
AppsFlyer	DP000615-DP000616
Charter Communication	DP000256-DP000259
Consumer Cellular	DP000617-DP000619
Cuebig	DP000620-DP000621
Discord, Inc.	DP000063 - DP000175
Discord, Inc.	DP000260-DP000564
Discord, Inc.	DP000622-DP000623
Discord, Inc.	DP000624-DP000674.01
Epsilon	DP000675-DP000677
Google LLC	SDM000385- SDM000397
Google LLC	DP000695-DP000696
Google LLC	DP000697-DP000727
Kik	DP000578-DP000579
Kochava	DP000728-DP000752
LiveRamp	DP000753-DP000754
Magnite	DP000755-DP000757
Meta Platforms, Inc.	DP000226-DP000232
Meta Platforms, Inc.	DP000580-DP000588
Meta Platforms, Inc.	DP000678
Meta Platforms, Inc.	DP000679-DP000694

Microsoft Corporation	DP000589-DP000593
NextRoll	DP000758
PayPal, Inc.	DP000759-DP000760
Quadranet	DP000761
Reddit	DP000594-DP000596
Roblox Corp.	DP000597-DP000598
Snap, Inc.	DP000762
Sovrn	DP000763-DP000766
Tapad	DP000767
TextNow, Inc.	DP000768-DP000783
TextNow, Inc.	DP000784-DP000786
T-Mobile	DP000787-DP000794
TrueData	DP000795-DP000797
Tzulo, Inc.	DP000798
Verizon	DP000799-DP000807
WhatsApp, LLC	DP000808-DP000811
X Corp	DP000599-DP000600.09
Zeta Global	DP000812-DP000817
Zoominfo	DP000818-DP000824

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact the undersigned.

Very truly yours,

BREON PEACE  
United States Attorney

By: /s/ Andrew Reich  
Alexander Solomon  
Laura Zuckerwise  
Andrew Reich  
Assistant U.S. Attorney  
(718) 254-6204

Enclosures

cc: Clerk of the Court (RER) (by ECF) (without enclosures)